

**REMARKS****35 U.S.C. 103(a)**

The Examiner has rejected claims 1-5 under 35 U.S.C. 103(a) as being unpatentable over Schneck et al., U.S. Pat. No. 6,260,039 and claims 6-20 under 35 U.S.C. 103(a) as being unpatentable over Schneck et al., U.S. Pat. No. 6,260,039 in view of Call, U.S. Pat. No. 6,154,738.

**Claims 1-5**

The examiner proposed that it would have been obvious to one ordinary skilled in the art at the time the invention was made to implement the claimed invention because Schneck teaches the substantial features of the claimed invention. Applicant respectfully disagrees and sets forth the following reason:

With respect to claim 1, Schneck fails to teach, describe, or suggest the following limitations:

“a directory of identifiers to a plurality of services;”

and

“an engine for receiving requests and using said identifiers to direct said requests to access said services when requested”

In regard to the first limitation, the Examiner stated that Schneck teaches “a method/system comprising storing identifiers of a plurality of services.” Applicant respectfully disagrees. The references cited only show a method and system of mapping a DAP directory listing of names and organizational information to a web interface. An important distinction needs to be made here about the content of the directory. While both the claimed invention and Schneck’s invention have data in their respective directories, the data stored in Schneck’s directory are contact information and organizational information and do not identify any service external to the directory. All incoming requests receive responses composed of information from Schneck’s directory. In contrast, the data in the claimed invention’s directory are identifiers. As stated in the second limitation, the engine uses the identifiers to direct requests to access services. The identifiers in the directory are not the responses for the incoming requests. Rather, the identifiers point to services that the requests will access. There is no such equivalent usage of the directory data in Schneck. Applicant thus asserts that Schneck fails to teach substantial limitations of the claimed invention.

**MPEP §2143** states:

“To establish a *prima facie* case of obviousness, three basic criteria must be met. First there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally the prior art reference (or references when combined) must teach or suggest all the claim limitations.”

Since Schneck fails to teach substantial limitations of the claimed invention, it fails to meet the third criteria for establishing a *prima facie* case of obviousness. Furthermore, with respect to the first criteria, Applicant disagrees with the Examiner’s assertion that it is common knowledge in the art to modify Schneck’s invention into the claimed invention. Applicant

asserts that the modification would be substantial because it would involve changing the essential function of Schneck's invention. One modification would involve reworking Schneck's directory. Schneck's teaching is directed at a system for accessing directory information for incoming requests. The data in the directory are the only end results possible for all requests, albeit the display of information may be customized. In contrast, the directory information of the claimed invention is not the end result of the incoming requests. Claim 1 has the limitation "an engine for receiving requests and using said identifiers to direct said requests to access said services." Thus the requests access the services identified in the directory, not the information in the directory itself. Applicant asserts that the modification to the Schneck's directory must involve changing its essential function (storing information to storing identifiers to plurality of services). Furthermore, even if a person of ordinary skill were to modify the function directory, there still remains the unobvious task of modifying the request engine in Schneck to make it direct requests "to access said services", as in the claimed invention. Unlike the claimed invention, every client request in Schneck is required to have a static URL reference pointing to a DAP (directory) data destination (col. 4 lines 24-29, 48-50, 53-55, 58-60). Therefore, Applicant submits that the requirements to change Schneck's system into the claimed invention are not common knowledge in the art. As this third criteria also cannot be met, a *prima facie obviousness* cannot be established. Applicant submits that the 103(a) rejection on claim 1 has been overcome.

As claims 2-5 depend from claim 1 or another claim that depends on claim 1, these claims are in a condition for allowance as well. Their rejection based upon 35 U.S.C. 103(a) has been overcome.

**Claims 6-10**

The examiner proposed that it would have been obvious to combine Schneck and Call to make the claimed invention. Applicant respectfully disagrees and sets forth the following reason:

With respect to claim 6-10, Call does not teach the directory limitation of claim 1 that Schneck fails to teach. Thus, even in combination with Call, the prior art does not teach all the limitations of claim 1 and a *prima facie* obviousness cannot be established. As claims 6-10 all depend on claim 1, Applicant asserts that their rejection based on 103(a) is overcome.

Claim 11 overcomes the 103(a) rejection for the same reason as claim 1. Neither Schneck nor Call teaches the limitation of storing identifiers in a directory. For this reason, Claim 11 overcomes the 103(a) rejection.

As claims 12-20 depend on claim 11, Applicant submits that they are in a condition of allowance as well.

**CONCLUSION**

The Examiner has rejected claims 1-20 under 35 U.S.C. 103(a) and objected to the drawings. In response, Applicant has corrected the drawings and responded to the 35 U.S.C. 103(a) rejection on claims 1-20. Applicant asserts that the present application is in a condition for allowance.

Respectfully submitted,

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CLAIMS

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1. A system comprising:  
a directory of identifiers to a plurality of services;  
an engine for receiving requests and using said identifiers to direct said requests to access  
said services when requested;  
a plurality of drivers for interfacing with said plurality of services and with said engine;  
and  
a plurality of service providers accessible to said plurality of drivers for providing  
10 services identified in said directory.
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2. The system of claim 1 wherein said directory includes metadata for each of said  
plurality of services in said directory.
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3. The system of claim 2 wherein said metadata defines a schema of a service's  
input and output interfaces.
4. The system of claim 3 wherein said metadata further includes configuration  
parameters for configuring a driver associated with said service.
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5. The system of claim 1 wherein said services are accessible via an API.
6. The system of claim 1 wherein said services are XML based services.

7. The system of claim 1 wherein said a service provider comprises an entity that is capable of receiving some information and providing a response.

8. The system of claim 1 wherein said engine interprets said requests and determines what services are needed, directs requests to the appropriate services via said service drivers, and builds responses into replies.

9. The system of claim 1 wherein said requests comprises HTTP requests.

10. The system of claim 1 wherein said access to said system is accomplished via a web browser.

11. A method for accessing services comprising:  
storing identifiers of a plurality of services in a directory;  
providing requests to an engine wherein said engine use said identifiers to direct said requests to access said plurality of services when requested; and  
interfacing with said plurality of services and with said engine via a plurality of drivers based on said requests.

12. The method of claim 11 wherein said directory includes metadata for each of said plurality of services in said directory.

13. The method of claim 12 wherein said metadata defines a schema of a service's input and output interfaces.

14. The method of claim 13 wherein said metadata further includes configuration parameters for configuring a driver associated with said service.

5 15. The method of claim 11 wherein said services are accessible via an API.

16. The method of claim 11 wherein said services are XML based services.

10 17. The method of claim 11 wherein said a service provider comprises an entity that is capable of receiving some information a providing a response.

18. The method of claim 11 wherein said engine interprets said requests and determines what services are needed, directs request to the appropriate services via said service drivers, and builds responses into replies.

15 19. The method of claim 11 wherein said requests comprises HTTP requests.

20. The method of claim 11 wherein said access to said system is accomplished via a web browser.